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7 *Counsel for Defendant Discover Bank*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 Jennifer Sharpe,

11 Plaintiff,

12 v.

13 Equifax Information Services LLC;
 Experian Information Solutions, Inc.;
 14 Trans Union LLC; Innovis Data Solutions,
 Inc.; Backgroundchecks.com LLC;
 15 National Consumer Telecom & Utilities
 Exchange, Inc.; Clarity Services, Inc.;
 16 Discover Bank; Capital One, N.A.; U.S.
 Bancorp; and The Toronto-Dominion
 17 Bank.

18 Defendants.

Case No. 2:24-cv-02143-JCM-NJK

**Joint Motion and Proposed Order to
 Extend Discover Bank's Deadline to
 Respond to Plaintiff's Complaint**

(First Request)

19 The deadline for defendant Discover Bank ("Discover") to respond to plaintiff
 20 Jennifer Sharpe's complaint is December 16, 2024. Discover has requested, and
 21 Sharpe has agreed, that this deadline be extended up to and including January 10,
 22 2025.

23 There is good cause for this extension. Discover's counsel requires additional
 24 time to continue investigating Sharpe's allegations, to explore whether the parties'
 25 dispute can be resolved without the need for litigation, and to confer with Discover
 26 regarding a response to the complaint. Further, counsel anticipates that during this
 27 extended period, the holidays—and the attendant closures of the Court and private
 28 businesses—will delay counsel's efforts to advance the parties' settlement efforts

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1 through discussions with opposing counsel and Discover.

2 This is the first request for an extension of the deadline to respond to the
3 complaint, and it is made in good faith and not for purpose of delay.

4 Dated: December 16, 2024

5 BALLARD SPAHR LLP

FREEDOM LAW FIRM

6 By: /s/ David E. Chavez

By: /s/ Gerardo Avalos

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ORDER

IT IS SO ORDERED:


United States Magistrate Judge

DATED: December 17, 2024

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